

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

BRANDON COOPER,

Plaintiff,

-against-

THE OFFICE OF THE COMMISSIONER OF
BASEBALL d/b/a MAJOR LEAGUE BASEBALL,
and PDL BLUE, INC.,

Defendants.

Civil Case No.: 24-cv-3118

**STIPULATION ALLOWING
PLAINTIFF TO FILE AN
AMENDED COMPLAINT**

WHEREAS, on April 24, 2024, Plaintiff Brandon Cooper (“Plaintiff”) filed his Complaint against The Office of the Commissioner of Baseball d/b/a Major League Baseball and PDL Blue Inc. (“Defendants”) alleging a hostile work environment and wrongful termination because of his sexual orientation and gender and/or retaliation in violation under the New York State Human Rights and New York City Human Rights Law;

WHEREAS, Plaintiff seeks to file an amended complaint that, *inter alia*, adds claims under Title VII of the Civil Rights Act of 1964 and Alexander Lawrie as an additional Plaintiff;

WHEREAS, a copy of Plaintiff’s proposed Amended Complaint is attached hereto as **Exhibit A**;


IT IS HEREBY STIPULATED AND AGREED, between Plaintiff and Defendants, by and through their respective counsel, that:

1. Pursuant to Federal Rule 15(a)(2), Plaintiff may file his amended complaint that is attached hereto as **Exhibit A**;
2. Defendants’ deadline to answer, move, or otherwise respond shall be forty-five (45) days after the Amended Complaint is filed; and

3. In so stipulating, Defendants have not waived any defenses they may raise in response to the Amended Complaint.

Dated: October 7, 2024

JOSEPH & NORINSBERG, LLC



CAITLIN DUFFY
Attorneys for Plaintiff

Dated: October 7, 2024

EPSTEIN BECKER & GREEN, P.C.

/s/ Shira M. Blank

SHIRA M. BLANK
Attorneys for Defendants